

# **EXHIBIT 20**

**From:** [John Downing](#)  
**To:** [Chiaviello, Elizabeth M.](#); [Minne, Jacob J.O.](#); [Lyons, Michael J.](#); [Hsu-Hoffman, Ahren C.](#); [WSOU v OnePlus](#); [mark waltfairpllc.com](#)  
**Cc:** [WSOU v. OnePlus](#)  
**Subject:** RE: WSOU v. OnePlus - Amended Preliminary Infringement Contentions  
**Date:** Wednesday, November 10, 2021 4:14:06 PM

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[EXTERNAL EMAIL]

Elizabeth,

We are surprised that OnePlus has raised this issue again in view of the Court's response the last time it was raised. WSOU has gone to great lengths to amend its preliminary infringement contentions to address OnePlus's concerns. As you confirmed during the last meet and confer, OnePlus is not confused about the infringement theories disclosed or scope of discovery. Moreover, WSOU's latest amended preliminary infringement contentions provided OnePlus with exemplary information regarding why the contentions are representative of other products. We are therefore confused by your latest attempt to complain about the contentions and your indication that OnePlus will file a motion to strike. WSOU does not have any information from OnePlus regarding why the latest amended preliminary contentions are not sufficient and your continued feigned confusion over what WSOU is accusing is not well-taken. We trust this is not simply an attempt to limit the scope of discovery of the accused products. Regardless, we reserve our rights to respond to your motion to strike accordingly.

Regards,

John

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**From:** Chiaviello, Elizabeth M. [mailto:[elizabeth.chiaviello@morganlewis.com](mailto:elizabeth.chiaviello@morganlewis.com)]  
**Sent:** Tuesday, November 9, 2021 10:10 AM  
**To:** John Downing <[JDowning@kasowitz.com](mailto:JDowning@kasowitz.com)>; Minne, Jacob J.O. <[jacob.minne@morganlewis.com](mailto:jacob.minne@morganlewis.com)>; Lyons, Michael J. <[michael.lyons@morganlewis.com](mailto:michael.lyons@morganlewis.com)>; Hsu-Hoffman, Ahren C. <[ahren.hsu-hoffman@morganlewis.com](mailto:ahren.hsu-hoffman@morganlewis.com)>; WSOU v OnePlus <[WSOUvOnePlus@morganlewis.com](mailto:WSOUvOnePlus@morganlewis.com)>  
**Cc:** WSOU v. OnePlus <[WSOUvOnePlus@kasowitz.com](mailto:WSOUvOnePlus@kasowitz.com)>  
**Subject:** RE: WSOU v. OnePlus - Amended Preliminary Infringement Contentions

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Counsel,

OnePlus reviewed WSOU's Amended Infringement Contentions, and they remain wholly deficient. WSOU has again failed to chart all the accused products or even—at minimum—provide a description of why a single chart is representative of all of OnePlus's products that WSOU contends are at issue in this case. OnePlus intends to file a motion to strike or in the alternative compel WSOU to comply with the Court's procedures for infringement contentions. Please confirm by 5:00 pm ct on Wednesday, November 10 whether WSOU will commit to amending its infringement contentions to comply with the Court's procedures by November 22, or if WSOU opposes OnePlus's motion.

**Elizabeth M. Chiaviello**

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**From:** John Downing <[JDowning@kasowitz.com](mailto:JDowning@kasowitz.com)>

**Sent:** Tuesday, October 26, 2021 11:59 PM

**To:** Minne, Jacob J.O. <[jacob.minne@morganlewis.com](mailto:jacob.minne@morganlewis.com)>; Lyons, Michael J.

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**Subject:** WSOU v. OnePlus - Amended Preliminary Infringement Contentions

[EXTERNAL EMAIL]

Counsel,

Please see attached.

Regards,

John Downing

John Downing

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